

# EXHIBIT A

**HIGHLY CONFIDENTIAL**



**Transcript of Ronald C. DiLeo, Jr.**

Friday, August 19, 2022

***U.S. v. American Airlines and JetBlue Airways***

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Reference Number: 119163

1 UNITED STATES DISTRICT COURT  
2 FOR THE DISTRICT OF MASSACHUSETTS  
3 - - - - - x

4 UNITED STATES OF AMERICA,  
5 STATE OF ARIZONA,  
6 STATE OF CALIFORNIA,  
7 DISTRICT OF COLUMBIA ,  
8 STATE OF FLORIDA,  
9 COMMONWEALTH OF MASSACHUSETTS,  
10 COMMONWEALTH OF PENNSYLVANIA,  
11 and COMMONWEALTH OF VIRGINIA,  
12 Plaintiffs,

13 V. CASE NO. 1:21-CV-11558  
14 AMERICAN AIRLINES GROUP INC.,  
15 and JETBLUE AIRWAYS CORPORATION,  
16 Defendants.

17 - - - - - x

18 HIGHLY CONFIDENTIAL  
19 VIDEOTAPED DEPOSITION OF  
20 RONALD C. DILEO, JR.

21 LATHAM & WATKINS LLP  
22 John Hancock Tower, 20th Floor  
23 200 Clarendon Street  
24 Boston, MA 02116  
August 19, 2022  
9:39 a.m.

25 Reporter: Rosemary F. Grogan, RPR, CSR No. 112993

1      owned by Lufthansa.

2            Q.      So other than working for OpenSkies and then  
3      in a company owned by Lufthansa, have you worked for any  
4      other airlines?

5            A.      I have not.

6            Q.      And with AirPlus, you were not involved in the  
7      operations of Lufthansa; is that right?

8            A.      That's correct.

9            Q.      Do you have a degree in economics?

10          A.      I do not.

11          Q.      Do you have a degree in law?

12          A.      I do not.

13          Q.      Have you been trained in economics in some  
14      other way?

15          A.      No.

16          Q.      Have you been trained in law in some other  
17      way?

18          A.      No.

19          Q.      You attended Notre Dame; is that right?

20          A.      I did.

21          Q.      We may have a conversation about that during  
22      the break. We'll hold that -- we'll hold that for the  
23      break.

24          A.      Okay.

25          Q.      Your first job after college, was that with --

1 with Rosenbluth?

2 A. It was.

3 Q. And that was a travel management company,  
4 correct?

5 A. It's a travel agency and a travel management  
6 company.

7 Q. You started there in '78 --

8 A. Yes.

9 Q. -- is that right?

10 A. 1978.

11 Q. Stayed until '03, correct?

12 A. That's correct. We sold the business to  
13 American Express.

14 Q. And what was your position when you started at  
15 Rosenbluth?

16 A. Delivery guy.

17 Q. And your final position was chief operating  
18 officer, correct?

19 A. That's correct.

20 Q. As chief operating officer at Rosenbluth, what  
21 were your responsibilities?

22 A. My responsibilities were pretty much  
23 everything having to do with the day-to-day operation of  
24 the business and the positioning of the company in  
25 various parts of the world as in a competitive way. So

1 it included operations, it included supply air  
2 management, it included human resources, it included  
3 technology, it included sales, marketing, account  
4 management, client retention, growth.

5 That was pretty much it.

6 Q. You also had responsibilities for maintaining  
7 supplier relations; is that right?

8 A. That's correct.

9 Q. And what did maintaining supplier  
10 relationships entail?

11 A. Well, there's a client component to that and  
12 there's a general day-to-day component to it. On the  
13 client component, my role was to give a view of the  
14 travel industry to procurement people and the travel  
15 managers that they could use in terms of managing their  
16 own programs anticipating, you know, what their  
17 program -- what was going to shape their program, and  
18 then in some cases acti- -- actively being involved with  
19 negotiating with airlines on -- on their behalf.

20 On the travel management company side of  
21 things, the -- the objective was to manage the  
22 relationships with each of the airline pro- --  
23 suppliers, excuse me, hotel suppliers, car rental  
24 suppliers, ground transportation. You know, anyone who  
25 was a supplier for Rosenbluth, in that case, and -- and

1 ultimately, I had the same kind of role in American  
2 Express, but it was in Europe.

3 Q. So part of your -- your responsibility as  
4 chief operating officer at Rosenbluth was working  
5 directly with airlines; is that right?

6 A. That's correct.

7 Q. And with hotels --

8 A. Mm-hmm.

9 Q. -- is that right?

10 A. Yes.

11 Q. And other travel suppliers; is that right?

12 A. That's correct.

13 Q. And after Rosenbluth, you worked at American  
14 Express, right?

15 A. That's correct.

16 Q. And that was after American Express acquired  
17 Rosenbluth; is that right?

18 A. That's right.

19 Q. And your final role at American Express was  
20 senior vice president and general manager of -- and had  
21 business in Europe and the Middle East; is that right?

22 A. The EMEA, Europe, Middle East and Africa,  
23 that's correct.

24 Q. And what were your responsibilities in that  
25 role?

1 A. Okay.

2 Q. And under your entry for The Association of  
3 Corporate Travel Executives, do you see that in the  
4 middle of the -- middle of the page?

5 A. I do.

6 Q. It -- it states there that -- is that  
7 pronounced ACTE?

8 A. ACTE.

9 Q. ACTE. Okay. That "ACTE focused on education  
10 and advancing the interests of both buyers and suppliers  
11 in the business travel segment."

12 Do you see that?

13 A. I do.

14 Q. So can you explain to me what ACTE did to  
15 advance the interests of both buyers and suppliers in  
16 the business travel segment?

17 A. Okay. So what we would do is we would  
18 identify best practices in procurement and travel  
19 management in general between, you know, different  
20 companies and we would showcase them and set up  
21 education sessions, panel discussions, and so forth,  
22 where we openly discussed the best practices and -- and  
23 gave -- had -- had sessions.

24 I was about a big believer in experiential  
25 learning, right, which is rather than doing classroom



1 stuff, we created events, you know, where we created  
2 experiences where people could actually kind of feel,  
3 you know, what they were learning as opposed to just  
4 reading about it. And so that -- we did a lot of that,  
5 right?

6 So we had two global conferences -- well, two  
7 and a half, really, global conferences a year; one in  
8 the U.S., one in Europe, and one in Singapore. And then  
9 we had probably 50 or so other smaller conferences in  
10 various cities in the world. And then each of those  
11 cities, there would be a set of best practices or things  
12 that -- where people could learn from each other, you  
13 know, in terms of travel management, experiences, and --  
14 and how to negotiate with suppliers, how to manage  
15 your -- your traveling population, how to make, you  
16 know, the travel function in your company something  
17 that's, you know, a productive function, not just a cost  
18 center, you know, those type -- those types of things.

19 Q. And here, "buyers" refers to travel management  
20 companies; is that right?

21 A. Generally buyers are -- work for the  
22 corporation. They're -- you know, and sometimes they're  
23 travel managers, you know, depending on, you know, how a  
24 company is -- is organized. They could be both a travel  
25 manager and a procurement person or they could just be a

1 procurement person that's supporting a travel manager.

2 Q. And "suppliers," as you state in your CV in  
3 that entry for ACTE, suppliers means airlines and  
4 hotels, among others; is that right?

5 A. Yep. Yes.

6 Q. And in 2014, you -- you joined ALTOUR; is that  
7 right?

8 A. That's correct.

9 Q. And ALTOUR is a travel management company,  
10 correct?

11 A. They're a travel agency and a travel  
12 management company.

13 Q. How did those two functions as an agency and  
14 as a travel management company differ?

15 A. So the travel agency side is primarily dealing  
16 with vacation planning where the travel agents kind of  
17 create an experience, you know, and -- and the agents,  
18 you know, explain that experience and the destinations  
19 that they're traveling to, and it's all the pleasure  
20 side, the fun part of the travel industry.

21 The travel management company side is all of  
22 the corporate -- the corporate travel, which is, you  
23 know, the stuff I was talking about before, travel  
24 management, helping companies negotiate programs with  
25 their suppliers, helping them to manage compliance

1           A.     Well, much like, you know, this -- this  
2     relationship with -- with Latham & Watkins, you get  
3     paid, you know, by -- typically in a TMC role, we get  
4     paid on a retainer, you know. So it would be a  
5     monthly -- a monthly fee and -- and we would do, you  
6     know, whatever we needed -- whatever needed to be done,  
7     you know, in exchange for a monthly -- a month retainer.

8                     In this particular case, as you know, I broke  
9     this down to two other options, you know, which is  
10    hour- -- an hourly rate, daily rate, you know, and then  
11    there's a monthly retainer if we -- if those two are  
12    actually exceeded, but that's -- that's the nature of --  
13    of how In the Black operates; obviously plus expenses.

14                    If there's travel involved or if there's  
15    materials or something like that, then that gets billed  
16    as well, but I wouldn't consider that to be revenue.

17           Q.     And you mentioned that 70% of In the Black's  
18    business is with -- made up of revenue from agencies and  
19    TMCs, right?

20           A.     That's right.

21           Q.     What comprises the remaining 30%?

22           A.     So we do executive coaching work. We do  
23    operations work, particularly as related to call  
24    centers. We do sales and marketing training. We do  
25    account management training. We do proposal pitch

1 training, presentation pitches training, all things that  
2 help an agency to optimize the resources that they have,  
3 you know, in their -- in their company.

4 Q. Does In the Black perform any work directly  
5 for airlines?

6 A. The only work that's ever been done directly  
7 for airlines was the British Airways work. It started  
8 out as a project, you know, and then they asked me to  
9 become an employee, which I did, you know, which is --  
10 which is why, you know, I can concurrently have the In  
11 the Black Group and have a full-time job at the same  
12 time. I just stopped doing the consulting stuff and  
13 turn it back on again if I'm in between, you know,  
14 full-time, full-time roles.

15 But the British Airways work is the only  
16 airline that -- that we've ever done any -- any direct,  
17 you know, consulting with. You limited that to  
18 airlines, right? Because I -- we did do some work with  
19 the Intercontinental Hotel Group, with their board, but  
20 those were just like one-time projects.

21 I wasn't sure -- I don't remember if you said  
22 airlines only or suppliers in general.

23 Q. I did limit that to the airlines.

24 A. Okay.

25 Q. Is it fair to say that In the Black negotiates

1 supplier agreements on behalf of agencies and TMCs with  
2 airlines?

3 A. It's in conjunction with whoever heads up the  
4 supply relations of that travel agency or TMC, you know.  
5 So, in other words, we don't negotiate directly with an  
6 airline and then hand over, you know, a finished  
7 project. We -- we sit down, you know, with -- I sit  
8 down, you know, largely with whoever runs the supply  
9 relations area of the travel agency or TMC, and I  
10 understand what their objectives are, and then together  
11 we negotiate with -- with the airlines.

12 Q. So it's fair to say that In the Black has a  
13 role in negotiating contracts with airlines on behalf of  
14 TMCs; is that right?

15 A. As counsel.

16 Q. To the extent negotiations occur face-to-face,  
17 you're in the room, right?

18 A. I am.

19 Q. Has In the Black negotiated or taken part in  
20 negotiating any supplier contracts on behalf of travel  
21 management companies with American Airlines in the last  
22 five years?

23 A. American Airlines was -- was included in some  
24 negotiations with various airlines on behalf of a TMC in  
25 New York that I've done a lot of work with, but it

1 wasn't just American Airlines.

2 Q. Was that for one particular TMC?

3 A. It was.

4 Q. Which one was that?

5 A. Ovation.

6 Q. In the last --

7 A. Who is actually owned by American Express.  
8 They were just acquired.

9 Q. Other than working with Ovation has In the  
10 Black taken part in any other travel management company  
11 supplier agreement negotiations with American Airlines  
12 in the last five years?

13 A. Not in the last five years, no.

14 Q. Has In the Black taken part in any travel  
15 agency negotiations of supplier contracts with American  
16 Airlines in the last five years?

17 A. I think I just answered that. Just Ovation  
18 was the only client that we've done that kind of  
19 negotiating with in the last five years. I mean, we've  
20 done a lot of negotiating over -- over time, you know,  
21 but in the last five years, Ovation is probably the only  
22 one.

23 Q. When you say, a lot over time, what do you  
24 mean?

25 A. A number of different travel management

1 companies and travel agencies.

2 Q. Over the last 10 years, have you negotiated  
3 supplier contracts on behalf of clients with American  
4 Airlines other than Ovation which you've mentioned?

5 A. In the last 10 years?

6 Q. Yes, sir.

7 A. So that would be 2012, so yes.

8 Q. For which clients?

9 A. Travelocity, Egencia, which is the business  
10 travel part of Expedia; a company called Ultramar,  
11 Flight Center Group, American Express, Casto Travel.  
12 Those -- there could be others, but those are the -- the  
13 ones that -- that jump to mind.

14 Q. And all of those took place between 2012 --

15 A. '12.

16 Q. -- and 2017?

17 A. Yeah -- no, 2012 and 2022. You said 10 years,  
18 right?

19 Q. I -- I did. I had understood your answer  
20 about the last five years to only include Ovation.

21 A. Oh, okay. Right, right, right. Got it.

22 Q. And so, just -- just so we're on the same page  
23 here, in the last five years Ovation is the only client  
24 with whom you helped negotiate a supplier contract with  
25 American Airlines, correct?

1 A. And other airlines, not just American, yes.

2 Q. Which other airlines?

3 A. United, Delta, British Airways, and then the  
4 Alliance -- you know, the Alliance groups, like Star  
5 Alliance, Oneworld, Air France, which is, you know, part  
6 of the whole Delta and SkyTeam alliance.

7 So, you know, an -- an agency has some formal  
8 relationship with -- you know, with, you know, all the  
9 airlines, you know, but they have relationships that  
10 are, you know, more specific -- have more specific  
11 deliverables associated with them with -- you know, with  
12 the primary, you know, carriers. And, you know, clearly  
13 I didn't mention JetBlue in here because JetBlue really  
14 wasn't that big in the business travel world and these  
15 were business-travel-dominated agencies, you know,  
16 that -- I mean, the programs would apply across -- you  
17 know, across the board.

18 But anyway, yeah. This is kind of a glaring  
19 glimpse of the obvious, that JetBlue wasn't in that mix,  
20 and I just thought I would clarify that.

21 Q. Well, let -- let me -- let me ask the question  
22 just so -- just so I have it clearly, then.

23 Has In the Black negotiated any supplier  
24 contracts on behalf of clients with JetBlue in the last  
25 five years?



1 industry?

2 A. Same answer.

3 Q. Have you performed any consulting work for  
4 American Airlines?

5 A. I have not.

6 Q. Have you performed any consulting work for  
7 JetBlue?

8 A. I have not.

9 Q. Have you consulted for any corporate customer  
10 considering contracting with American Airlines?

11 A. Not in the -- in the context of contracting  
12 with American. I've consulted with corporate customers  
13 on a variety of things, but not specifically about  
14 American Airlines.

15 Q. When you say "not specifically about American  
16 Airlines," what do you mean?

17 A. Well, for example, this would be a company out  
18 of Texas called McKesson, and I did a mentorship for  
19 their travel manager, and part of the mentorship was  
20 educating him on supply negotiations. And they happened  
21 to, you know, have -- you know, about a year later, they  
22 did some -- you know, they did an airline RFP, and he  
23 led that.

24 You know, so not -- nothing directly related  
25 to American or even directly related to airlines in

1 and publications, and you can turn to Appendix B, if you  
2 need to, but my question is just a general question  
3 regarding the -- The Points Guy --

4 A. Mm-hmm.

5 Q. -- as a source.

6 Did you speak with the authors of any of The  
7 Points Guy's articles or blog posts that you cite in the  
8 report?

9 A. I did not speak -- I didn't speak with anyone.

10 Q. And actually, let me ask you to turn to  
11 Appendix B on page 34.

12 A. Okay.

13 Q. You have a section there on page 34 in  
14 Appendix B titled, "Case Documents," right?

15 A. That's correct.

16 Q. Does this list of case documents in Appendix B  
17 comprise the complete list of case documents that you  
18 relied upon in forming your opinion?

19 A. No, there are other case documents. These are  
20 the ones that I thought best supported points I was  
21 making in the expert report, so you'll find these cited  
22 in the footnote sections, but there was a -- there were  
23 other documents that -- that I didn't think were as  
24 relevant as these.

25 Q. So there were other documents that you relied

1 upon in forming your opinion that you don't identify in  
2 Appendix B, correct?

3 A. These -- these capture the documents that --  
4 that enabled me to render my opinion. You know, the  
5 other documents were interesting, but there's nothing  
6 incremental about them in -- in shaping my opinion. If  
7 all I had read were these, I would have had -- what  
8 you're reading is what -- what is -- is what you're --  
9 what you're reading, what would be my report.

10 Q. Well -- so my question, then, is whether there  
11 are other documents that you relied upon in forming your  
12 opinion that you don't identify in Appendix B?

13 A. There's other documents that I looked at that  
14 aren't referenced here in -- in Appendix B, but they  
15 didn't do anything to really render my opinion or shape  
16 my opinion.

17 Q. So there are other documents you looked at  
18 that aren't in Appendix B that you didn't rely on in  
19 forming your opinion; is that fair?

20 A. There -- there -- there are documents that had  
21 information that was, you know, interesting, but they  
22 didn't really have anything to do with, you know, my --  
23 drawing my -- the opinions that you see in my report, if  
24 that makes sense.

25 Q. Did you maintain a list of the documents that

1 There is -- you know, I -- there's opinions in here  
2 that -- that I stated that say how American, for  
3 example, has struggled for as long as I can remember  
4 them being competitive in the Boston and, you know, New  
5 York markets. And I remember distinctly one of the  
6 presentations shows -- it's an American Airlines  
7 presentation, shows American's share. You know, I  
8 believe it was Boston just going down year over year.

9 And it was like I knew it. I didn't have the  
10 data to support it, but I knew it, you know, just  
11 from -- you know, from my watching what's going on in  
12 those markets. That's what people pay me to do, is  
13 understand the dynamics of any given market.

14 That's just an example, but -- so all these  
15 documents did something like that, you know, for me.

16 Q. Did you already have an opinion on the  
17 Northeast Alliance before you reviewed the documents  
18 that you identify in Appendix B?

19 A. If you get to know me, you'll know me. I have  
20 an opinion on everything. And I had an opinion about,  
21 you know, the Northeast Alliance just from what I read,  
22 you know, in the -- you know, the media. And then when  
23 I was, you know -- when I was awarded this, you know,  
24 this -- this opportunity to be an expert to testify, I  
25 dug into the details and validated the opinions that I

1 had already kind of formed.

2 If -- if something would have come up that  
3 invalidated, you know, those opinions, I would have said  
4 that in -- in the document. I take this stuff very  
5 seriously.

6 Q. So you already had an opinion about the  
7 Northeast Alliance before you looked at any of the case  
8 documents, correct?

9 A. I had, you know, a casual opinion; nothing  
10 that I would call an expert opinion. You know, the  
11 documents made me an expert on my -- you know, in  
12 validating, you know, my -- my -- kind of my thoughts  
13 about how the alliance was -- you know, was going to  
14 operate.

15 Q. So you already had a casual opinion about the  
16 Northeast Alliance before you read any case documents;  
17 is that fair?

18 A. I think it's fair to say that I already had a  
19 view of the Northeast Alliance and what it was going to  
20 bring to the table for customers for, you know, the  
21 industry in general, and in -- in doing the deeper  
22 research associated with this project, these documents  
23 helped to -- to, you know, kind of validate all of what  
24 I was -- I was thinking.

25 None of this was preconceived, you know, if

1 that's what you're alluding to. There's no preconceived  
2 notions here, but, you know, you have to start  
3 somewhere. And I had a -- you know, kind of a view of  
4 what I thought the alliance was and the details, you  
5 know, brought themselves to life in what you see here in  
6 the attachments.

7 MS. SULLIVAN: Bill, I don't want to  
8 interrupt, but we've been going an hour. So when  
9 you're ready, I would like to take a break.

10 MR. JONES: Okay. I have a few more questions  
11 and then --

12 MS. SULLIVAN: Yeah. Yeah, I figured you're  
13 still in the middle.

14 BY MR. JONES:

15 Q. So you had a view about the Northeast Alliance  
16 before you read any of the depositions in this case as  
17 well, correct?

18 A. Mm-hmm.

19 MS. SULLIVAN: Asked and answered.

20 A. Yes.

21 Q. And you had a view about the Northeast  
22 Alliance before you conducted any interviews with  
23 American or Jet -- JetBlue employees; is that right?

24 A. That's correct.

25 Q. Did you seek out any documents that challenged

1 Q. Have you been involved in the conducting of  
2 surveys in your other work in the travel industry?

3 A. I have.

4 Q. Can you describe those occasions in which  
5 you've been involved in the conducting of surveys in the  
6 travel industry?

7 A. Sure. So, for example, one of my clients out  
8 of Germany is a car rental company. They -- I did some  
9 work with them on their loyalty program development and  
10 they wanted to align their loyalty programs with some  
11 airline -- with some of the key airline loyalty  
12 programs.

13 And I conducted a survey to have a database of  
14 travel managers and -- and -- and buyers of what would  
15 be important to them in -- in seeing, you know, a  
16 loyalty program, and a loyalty program that is aligned  
17 with one of their, you know, preferred airlines.

18 And I -- you know, it was a just a simple,  
19 10 -- you know, 10-question survey, and I would be able  
20 to use some of those results to help shape the alignment  
21 of the royalty programs between this car rental company  
22 and -- and a few airlines.

23 Q. Were you involved in any surveys when you were  
24 the executive director of ACTE?

25 A. Not me personally, but the association

1 in survey because, you know, that's a whole world of its  
2 own. And so we had -- we kind of had the technical  
3 skill, you know, on staff, but we may have also farmed  
4 some of it out if that person was uncomfortable in --  
5 you know, in developing the survey for the purposes that  
6 were -- you know, that were put forward.

7 Q. Is it fair to say that -- that you found  
8 surveys as a beneficial way of understanding the views  
9 of ACTE's members when you were executive director of  
10 ACTE?

11 A. Yeah, I think, because, you know, we're an  
12 association that belongs to the -- to the people. You  
13 know, we weren't an association setting our own  
14 messages. We were an association representing our  
15 members and delegates.

16 So you can only do that effectively if you ask  
17 people what -- you know, what they want to talk about  
18 and what they want to learn. And so we relied heavily  
19 on those, yes.

20 Q. Did you consider conducting a survey as part  
21 of forming your opinion in this case?

22 A. Absolutely not. I was told not -- not to have  
23 a conversation with anyone about this -- about this case  
24 or my -- or my report.

25 Q. Would you have liked to have conducted a



1 survey of corporate customers to help in forming your  
2 opinion?

3 A. Don't need it. I've got 44 years of -- of  
4 understanding of what makes customers happy and what  
5 they look for and -- and -- and what puts them off. I  
6 know that stuff cold.

7 Q. So no need to conduct any surveys of  
8 corporate --

9 A. Not for this report, no, no need. Sorry to  
10 interrupt.

11 Q. Yeah. Let me just caution you on -- on that.  
12 Like even if you know where my question is going --

13 A. Yeah, yeah, yeah, you told me that.

14 Q. -- please let me finish, and I will do the  
15 same with you on your answers.

16 A. Got it.

17 Q. Was there anything that you wanted to do to  
18 develop your opinions in this case that you were unable  
19 to do?

20 A. No.

21 Q. And let me ask -- let me ask the same about  
22 your report.

23 Was there anything you wanted to do to prepare  
24 your report here that you were unable to do?

25 A. No.

1 card and I was a participant on the airline part.

2 Q. When you say "a participant on the airline  
3 part," what did you do?

4 A. Evaluated the proposals that came in, went --  
5 sat through their presentations, gave guidance, you  
6 know, to the buyer as to what I thought was, you know,  
7 the best possible outcome as we kind of went through  
8 their decision process.

9 Q. You mentioned earlier today that sometimes  
10 serving as a mentor to corporate customers' travel  
11 departments.

12 Is that the role you were serving with  
13 Quintiles?

14 A. No.

15 Q. What role -- role were you serving there?

16 A. It was a [sic] outsource procurement role  
17 where Quintiles hired my firm and another firm that I  
18 collaborated with to help them to kind of guide them  
19 through this RFP process.

20 Q. What was the other firm that you collaborated  
21 with?

22 A. Partnership Travel Consulting.

23 Q. How did your firm and Partnership Travel  
24 Consulting divide the work?

25 A. Quintiles was a partnership travel consulting

C E R T I F I C A T E

COMMONWEALTH OF MASSACHUSETTS

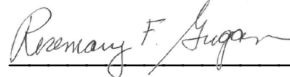
COUNTY OF PLYMOUTH

I, Rosemary F. Grogan, a Registered Professional Reporter and Notary Public duly commissioned and qualified in and for the Commonwealth of Massachusetts, do hereby certify:

That RONALD D. DILEO, JR., the witness whose deposition is hereinbefore set forth, appeared and was duly identified and sworn by me, and that the foregoing transcript is a true record of the testimony given by such witness to the best of my ability.

I further certify that I am not related to any of the parties in this matter by blood or marriage, and that I am in no way interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my hand this 23<sup>rd</sup> day of August, 2022.



Rosemary F. Grogan, RPR

CSR No. 112993

My Commission Expires: December 6, 2024